

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA

D.J.; TONI CORDOVA, et. al.)	
Plaintiffs,)	
vs.)	Civil Action No. 22-752
)	Class Action
UNIVERSITY OF IOWA HOSPITALS AND)	
CLINICS, an Iowa Entity, et. al.)	
)	
Defendants.)	

**DEFENDANTS ANN & ROBERT H. LURIE CHILDREN’S HOSPITAL OF CHICAGO
AND JOEL CHARROW, M.D.’S UNOPPOSED
MOTION FOR ADDITIONAL TIME TO FILE RESPONSIVE PLEADING**

Now Comes, Defendants, Ann & Robert H. Lurie Children’s Hospital of Chicago (incorrectly sued as Children’s Memorial Hospital) and Joel Charrow, M.D., by and through their attorneys, Barker, Castro & Steinback, LLC, and hereby moves, unopposed, for additional time to file their responsive pleadings in this matter and in support of said Motion state as follows:

1. On May 21, 2022, Plaintiffs filed their Complaint. (Dkt. No. 1).
2. Plaintiffs generally allege they suffered injuries because of a change in dosing of medication prescribed to them for Fabry disease. (Dkt. No. 1, ¶¶ 1-16). Plaintiffs allege, *inter alia*, that Defendants were physicians who worked with the pharmaceutical company that manufactured the drug at issue in varying capacities. (Dkt. No. 1, ¶¶ 17-40).
3. Plaintiffs’ allegations are extensive and complex, as evidenced by the length of the Complaint, including 12 Counts, against 23 Defendants, spanning 70 pages. (Dkt. No. 1). The events at issue occurred primarily through 2009-2012. (Dkt. No. 1).
4. Counsel for Defendants Ann & Robert H. Lurie Children’s Hospital (“Lurie”) and Joel Charrow, M.D. filed a Motion for Pro Hac Vice admission, which was granted July 18, 2022. (Dkt. Nos. 9-10).

5. Counsel for Defendants Lurie and Dr. Charrow waived service in this matter, with their Answers being initially due on August 8 and 10, 2022, respectively. (Dkt. Nos. 5-6).

6. Due to the complexity of the Complaint and the breadth of the different causes of action pled, Defendants Lurie and Dr. Charrow will require additional time to file their responsive pleadings. Additionally, the undersigned attorney who will have responsibility for drafting a responsive pleading is involved in multiple other matters with current deadlines requiring his attention, including but not limited to: drafting the brief of a defendant-appellee in a state court appeal in Illinois in *Johnson and Rosa et. al. v. Illinois Toll Highway Authority, et. al.*, No. 1-21-0941, et. al.; preparing for and drafting briefs in an appeal in the Seventh Circuit in *Bougher, et. al. v. Silver Cross, et. al.*, No. 22-2108; drafting briefs in support of a motion to dismiss in *Wereko v. Hon. Lori Rosen, et. al.*, No. 1:22-cv-02177.

7. In light of the above, Defendants Lurie and Dr. Charrow therefore request an extension of 45 days from the time when Dr. Charrow's brief was due, August 10, 2022, or until September 26, 2022 (which is the first business day following that date). Defense counsel for Lurie and Dr. Charrow contacted Plaintiffs' counsel, who has no objection to the requested extension of time.

8. This request for an extension is brought in good faith and not for the purpose of delay. As multiple Defendants have still not been served or appeared, this requested will not prejudice Plaintiffs and will not cause any meaningful delay in these proceedings.

WHEREFORE, Defendants, Ann & Robert H. Lurie Children's Hospital of Chicago (incorrectly sued as Children's Memorial Hospital) and Joel Charrow, M.D., respectfully requests that this Honorable Court enter an order granting them until September 26, 2022, to file responsive pleadings to Plaintiffs' Complaint.

Respectfully submitted,

Barker, Castro & Steinback, LLC

/s/ Joseph E. Comer

Attorney for Defendants, Joel Charrow and
Lurie Children's Hospital

Joseph E. Comer: jcomer@bclawllc.com
Andrea H. Kott: akott@bclawllc.com
BARKER, CASTRO & STEINBACK, LLC
303 W. Madison Street, Ste. 700
Chicago, IL 60606
(312) 855-9300

CERTIFICATE OF SERVICE

I hereby certify that on August 9, 2022, a copy of the foregoing Motion for Additional Time to File Responsive Pleadings was filed electronically. Service of this filing will be made on all ECF-registered counsel by operation of the court's electronic filing system. Parties may access this filing through the court's system.

/s/ Joseph E. Comer

Joseph E. Comer
BARKER, CASTRO & STEINBACK, LLC
303 W. Madison Street, Ste. 700
Chicago, IL 60606
(312) 855-9300
jcomer@bclawllc.com